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UNITED STATES DISTRICT COURT
for the
DISTRICT OF NORTH DAKOTA

CHARLYN GREENE ©™,)
Petitioner)
v)
NATIONSTAR MORTGAGE LLC d/b/a)
MR COOPER, <i>et.al.</i> ,)
MTC FINANCIAL, INC. d/b/a TRUSTEE)
CORPS, <i>et.al.</i> , TRUSTEE CORPS., <i>et.al.</i> ,)
)
And all persons unknown, claiming any)
legal or equitable right, title, estate, lien,)
or interest in the property described in the)
claim adverse to Petitioner's title, or any)
cloud upon Petitioner's title thereto)
Doe's 1 through 25,)
Respondent (s))
)

PETITIONER'S OPPOSITION TO
RESPONDENTS' FALSE FRAUD
ACCUSATION IN EQUITY
(Doc No. 66)

CASE NO.: 1:24-cv-00087-CRH

**PETITIONER'S OPPOSITION TO RESPONDENTS' FALSE FRAUD ACCUSATION
IN EQUITY**

Petitioner submits this response in opposition to Respondent's false and baseless accusation of fraud. The accusation, lodged without factual basis or legal support, represents a blatant attempt to discredit Petitioner's position through misrepresentation rather than substance. Petitioner addresses this misconduct directly to preserve the integrity of the record and correct the field of Equity.

I. The Fraud Accusation is Baseless and Procedurally Improper

Respondent's claim that Petitioner has committed "fraud" is wholly unsubstantiated and unsupported by any evidence. At no point has Respondent identified a false statement of material fact, demonstrated an intent to deceive, or shown reliance resulting in harm — the necessary

elements of fraud. The accusation is vague, conclusory, and clearly intended to distract from Respondent's own procedural silence and default. Respondents' deceitful filing is not a legitimate defense. It is a calculated smear designed to provoke, distort the record, and shift attention away from the substantive issues before the Court — including Petitioner's perfected administrative judgment and Respondent's failure to rebut, respond, or cure.

II. Respondents Seek to Distract from the Record and Avoid Their Own Default

Rather than address the perfected administrative record, Respondents resort to vague accusations. Respondents' memorandum makes no direct response to Petitioner's verified affidavits, no rebuttal to the material facts, and no challenge to the procedural record already in place. Instead, Respondents attempt to shift attention from their own silence and default by introducing inflammatory language unsupported by law or evidence.

III. This Conduct Warrants Judicial Correction

Petitioner is aware that Rule 11(c)(2) requires that a formal motion for sanctions be filed separately, with an opportunity to cure. This motion is not submitted under that rule. However, Petitioner places this Equity Court and Respondent on notice that the fraud accusation, made without evidentiary support and for the purpose of harassment and delay, may be subject to sanctions under Rule 11 or the Court's inherent authority to deter bad faith conduct and abuse of process. Petitioner reserves all rights to file a separate Rule 11 motion should the Respondent fail to withdraw or correct their baseless accusation.

IV. Conclusion

Petitioner respectfully moves this Equity Court to disregard Respondents' unfounded accusations and recognize it as an act of procedural desperation rather than a lawful defense. Petitioner stands as the only party in this action to have filed in truth, supported by an undisputed and verified record, lawful process, and supported by the governing principles of equity. Petitioner will not be bullied, intimidated, deterred, or defamed without consequence. Jurisdiction in equity is

not granted by the Court — it is invoked by clean hands, perfected process, and an unrebutted record. The burden Respondents sought to shift now returns as the boomerang of their own conscience, sealed in the silence they chose and the default they authored.

Dated this 21st day of April, 2025

By: /s/Charlyn : Greene
Charlyn : Greene, Executor and Real Party in Interest
Appearing in Equity, with Clean Hands
Living Woman and Holder if the Private Record
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